

INTERVENTION ORIGINAL



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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

KRISTIN K. MAYES, Chairman

GARY PIERCE

PAUL NEWMAN

SANDRA D. KENNEDY

BOB STUMP

2010 AUG 20 A 11:38

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

AUG 20 2010

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IN THE MATTER OF THE APPLICATION OF
AJO IMPROVEMENT COMPANY FOR
APPROVAL OF THE TRANSFER OF ASSETS
TO ARIZONA PUBLIC SERVICE COMPANY

DOCKET NO. E-01025A-10-0334

DOCKET NO. E-01345A-10-0334

MOTION TO INTERVENE

Arizona Public Service Company ("APS" or the "Company"), through undersigned counsel, and pursuant to A.A.C. R14-3-105, applies to the Arizona Corporation Commission ("Commission") for an order granting APS leave to intervene in this proceeding.¹ In support of its motion, APS states as follows:

1. APS is an Arizona corporation that provides electric service to customers within the state of Arizona.

2. In this docket, Ajo Improvement Company ("Ajo") has applied for a Commission order pursuant to A.R.S. § 40-285 (the "Application") to approve the transfer of fourteen (14) 69 kV distribution line poles and related facilities to APS for the purpose of facilitating the interconnection of a renewable generation project near Ajo, Arizona.

3. APS will be directly and substantially affected by the outcome of the Application.

4. No other party can adequately represent the interests of APS in this docket. APS's participation will not unduly broaden the issues presented.

4. Service of all correspondence, documents or pleadings should be made to APS as follows:

¹ APS realizes that its utility identification number is already indicated in the docket numbers for this proceeding. However, the Application is solely an Ajo pleading, and the Company believed this intervention necessary to make it a formal party.

1 Thomas L. Mumaw
2 Pinnacle West Capital Corporation
3 Law Department
4 400 N. 5th Street, MS 8695
5 P.O. Box 53999
6 Phoenix, Arizona 85072-3999
7 Telephone: (602) 250-3630
8 Facsimile: (602) 250-3393
9 Email: Thomas.Mumaw@pinnaclewest.com

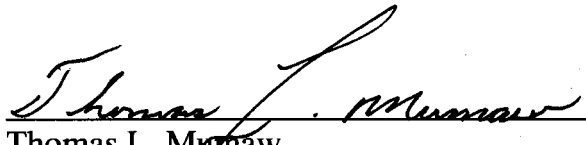
10 With a copy to:

11 Jeffrey Creedon
12 Arizona Public Service Company
13 Regulatory Affairs
14 400 N. 5th Street, MS 9708
15 P. O. Box 53999
16 Phoenix, Arizona 85072-3999
17 Telephone: (602) 250-2214
18 Facsimile: (602) 250-3003
19 Email: Jeffrey.Creedon@aps.com

20 WHEREFORE, APS requests that the Administrative Law Judge issue an order
21 granting its Motion to Intervene.

22 RESPECTFULLY SUBMITTED this 20th day of August 2010.

23 ARIZONA PUBLIC SERVICE COMPANY

24 
25 Thomas L. Mumaw

26 Pinnacle West Capital Corporation
27 Law Department
28 Post Office Box 53999, MS 8695
29 Phoenix, Arizona 85072-3999

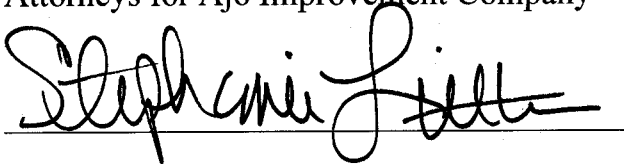
30 Original and 15 copies of the foregoing
31 filed this 20th day of August 2010 with:

32 Docket Control
33 Arizona Corporation Commission
34 1200 West Washington Street
35 Phoenix, Arizona 85007

1 And copies of the foregoing mailed, faxed or
2 transmitted electronically this 20th day of
3 August 2010 to:

4 Mr. Roy Archer
5 Operations Manager
6 Ajo Improvement Company
7 P.O. Drawer 9
8 Ajo, AZ 85321

9 Michael W. Patten
10 Jason D. Gellman
11 Roshka, DeWulf & Patten, PLC
12 One Arizona Center
13 400 E. Van Buren Street, Suite 800
14 Phoenix, AZ 85004
15 Attorneys for Ajo Improvement Company

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